

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

REPUBLICAN NATIONAL  
COMMITTEE, NATIONAL  
REPUBLICAN SENATORIAL  
COMMITTEE; MONTANA  
REPUBLICAN STATE CENTRAL  
COMMITTEE,

Plaintiffs,

v.

STEPHEN BULLOCK, in his  
official capacity as Governor of  
Montana; COREY STAPLETON, in  
his official capacity as Secretary of  
State of Montana,

Defendants.

No. 6:20-CV-66-DLC

**DECLARATION OF SPENSER  
MERWIN**

I, Spencer Merwin, declare:

1. I am the Executive Director of the Montana Republican State Central Committee (MTGOP). I am over the age of eighteen and I have personal knowledge of the following facts. If called as a witness, I could and would competently testify thereto.

2. At last Tuesday's hearing on Plaintiffs' motion for injunctive relief, questions arose about the number of in-person polling places that will be open to Montana voters who want to vote in person on Election Day.

3. As of September 24, the Secretary of State has listed changes to voting options for individual counties, which includes in-person polling places that will be open to Montanans who want to vote in person on Election Day. Those lists can be accessed at [sos.mt.gov](http://sos.mt.gov). And they indicate that the number of in-person polling places open to Montanans on Election Day will drop precipitously in counties that have opted to follow Governor Bullock's Election Directive.

4. Forty-six of Montana's 56 counties have opted to follow Governor Bullock's Directive. In the planned 2020 general election, Montana's 56 counties had roughly 335 in-person polling places scheduled for Election Day. But for the 2020 general election under the Governor's directive, those 56 counties have announced that they will have only 89 in-person polling places open on Election Day. That represents a **drop of 73%** in the number of in-person polling places open to Montanans who want to vote in person on Election Day across the state.

5. Just as important, 45 of the 46 counties participating in the mail ballot election will only allow for in-person voting at the county election office, causing significant disruption for those interested in voting in person residing in rural parts of the county without a nearby polling location accessible.

6. For the 2020 general election, the 10 counties not conducting a mail ballot election have confirmed that they will have 44 in-person polling places open on Election Day.

7. The changes in the 46 counties that have opted to follow the Governor's Directive have caused the corresponding diversions of the MTGOP's resources described in my September 18, 2020, declaration. Again, the MTGOP would not have to divert its resources in those ways if the Directive were not in place.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: September 24, 2020



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Spenser Merwin